

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

OCA-Greater Houston, *et al.*,

Plaintiffs,

v.

Jose Esparza, *et al.*,

Defendants.

No. 1:21-cv-00780-XR

Consolidated with *La Unión del Pueblo
Entero v. Abbott*, No. 5:21-cv-844

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,
NATIONAL REPUBLICAN SENATORIAL COMMITTEE, AND NATIONAL
REPUBLICAN CONGRESSIONAL COMMITTEE’S [PROPOSED] ANSWER**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

INTRODUCTION

1. The Republican Committees deny that Texas Senate Bill 1 (“SB 1”) is “illegal” or “aims to make it harder for Texans to vote.” Voter turnout data and the statements of public officials speak for themselves and do not require a response. Paragraph 1 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 1 and so deny them.

2. Legislative history speaks for itself and does not require a response. The allegations in Paragraph 2 are legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 2 and so deny them.

3. The Republican Committees deny that SB 1 “make[s] it more burdensome and potentially impossible for many Texas voters and community organizations to participate in the democratic process.” The Republican Committees deny the remaining allegations in Paragraph 3.

4. The Republican Committees deny that SB 1 “takes particular aim” at any voters or organizations. The statute speaks for itself and does not require a response. Paragraph 4 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

5. The statute speaks for itself and does not require a response. Paragraph 5 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

6. The Republican Committees deny that SB 1 “target[s]” any voters or community organizations. Court decisions speak for themselves and do not require a response. Paragraph 6 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees deny that Plaintiffs are entitled to relief.

JURISDICTION AND VENUE

7. Paragraph 7 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 7.

8. Paragraph 8 states a legal conclusion that does not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 8.

PARTIES

9. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 9 and so deny them. Paragraph 9 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 9.

10. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 10 and so deny them. Paragraph 10 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 10.

11. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 11 and so deny them. Paragraph 11 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 11.

12. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 12 and so deny them. Paragraph 12 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 12.

13. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 13 and so deny them. Paragraph 13

states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 13.

14. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14 and so deny them.

15. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15 and so deny them.

16. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 and so deny them.

17. The Republican Committees deny SB 1 harms anyone. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17 and so deny them. Paragraph 17 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 17.

18. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 18 and so deny them.

19. The Republican Committees deny SB 1 harms anyone. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19 and so deny them. Paragraph 19 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 19.

20. The Republican Committees deny SB 1 harms anyone. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 20 and so deny them. Paragraph 20 states legal conclusions that do not

require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 20.

21. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 21 and so deny them.

22. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 22 and so deny them.

23. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 23 and so deny them. Paragraph 23 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 23.

24. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 24 and so deny them.

25. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 25 and so deny them.

26. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 26 and so deny them.

27. The Republican Committees deny SB 1 harms anyone. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 27 and so deny them. Paragraph 27 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 27.

28. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 28 and so deny them.

29. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29 and so deny them.

30. The Republican Committees deny SB 1 harms anyone. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 30 and so deny them. Paragraph 30 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 30.

31. The Republican Committees admit that Defendant Esparza is the Deputy Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. The statutes speak for themselves and do not require a response. Paragraph 31 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

32. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity. The statutes speak for themselves and do not require a response. Paragraph 32 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

33. The Republican Committees admit that Defendant Longoria is the Harris County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The lawsuit speaks for itself and does not require a response.

34. The Republican Committees admit that Defendant DeBeauvoir is the Travis County Clerk and that Plaintiffs purport to sue her in her official capacity. The lawsuit speaks for itself and does not require a response.

35. Paragraph 35 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

36. Paragraph 36 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

FACTUAL BACKGROUND

37. The Republican Committees deny that SB 1 makes it difficult for Texans to vote, that the Texas Legislature sought to “curtail Texans’ voting rights,” or that the Texas Legislature “did so in active defiance of well-established federal voting rights laws and principles.” Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 37 and so deny them.

38. The Republican Committees deny that SB 1 will “illegally disenfranchise voters.” Paragraph 38 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 38 and so deny them.

39. Court decisions speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 39 and so deny them. The Republican Committees do not

doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

40. Litigation documents speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 40 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

41. Court decisions and litigation documents speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 41 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

42. Court decisions speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 42 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

43. Court decisions and litigation documents speak for themselves and do not require a response. Paragraph 43 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its

history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

44. Court decisions speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 44 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

45. Court decisions, litigation documents, and legislative history speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

46. Court decisions speak for themselves and do not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008). The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 46 and so deny them.

47. Court decisions speak for themselves and do not require a response. Paragraph 47 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 47 and so deny them.

48. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 48 and so deny them.

49. The referenced documents speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 49 and so deny them.

50. The referenced document speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 and so deny them.

51. Litigation documents speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51 and so deny them.

52. The Republican Committees deny that Texas has “restrictive” voting laws or that voting in Texas is “difficult.” Paragraph 52 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

53. The referenced documents and court decisions speak for themselves and do not require a response. Paragraph 53 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required,

these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 53 and so deny them.

54. The referenced document speaks for itself and does not require a response. Paragraph 54 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 54 and so deny them.

55. The referenced document speaks for itself and does not require a response. Paragraph 55 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 55 and so deny them.

56. The referenced documents and court decisions speak for themselves and do not require a response. Paragraph 56 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 56 and so deny them.

57. Court decisions speak for themselves and do not require a response. Paragraph 57 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 57 and so deny them.

58. The Republican Committees deny that that Texas “attempts to make voting as difficult as possible.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 58 and so deny them.

59. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 and so deny them.

60. The referenced documents speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 60 and so deny them.

61. Court decisions, Census Bureau data, and the referenced article speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61 and so deny them.

62. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 62 and so deny them.

63. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 63 and so deny them.

64. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 64 and so deny them.

65. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. Legislative history speaks for itself and does not require a response. Paragraph 66 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 66 and so deny them.

67. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67 and so deny them.

68. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 68 and so deny them.

69. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 69 and so deny them.

70. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 70 and so deny them.

71. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 and so deny them.

72. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 72 and so deny them.

73. Legislative history and the referenced article speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 73 and so deny them.

74. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 74 and so deny them.

75. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 75 and so deny them.

76. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 76 and so deny them.

77. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 77 and so deny them.

78. The statute speaks for itself and does not require a response. Paragraph 78 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

79. The Republican Committees deny that SB 1 violates any federal law. The statute speaks for itself and does not require a response. Paragraph 79 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

80. The statute speaks for itself and does not require a response. Paragraph 80 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

81. Texas law speaks for itself and does not require a response. Paragraph 81 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

82. The statute speaks for itself and does not require a response. Paragraph 82 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

83. The statute speaks for itself and does not require a response. Paragraph 83 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

84. The statute speaks for itself and does not require a response. Paragraph 84 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

85. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85 and so deny them.

86. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86 and so deny them.

87. The statute speaks for itself and does not require a response. Paragraph 87 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

88. The statute speaks for itself and does not require a response. Paragraph 88 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

89. The statute speaks for itself and does not require a response. Paragraph 89 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

90. The statute speaks for itself and does not require a response. Paragraph 90 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

91. The statute speaks for itself and does not require a response. Paragraph 91 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

92. The statute speaks for itself and does not require a response. Paragraph 92 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

93. The statute speaks for itself and does not require a response. Paragraph 93 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

94. The statute speaks for itself and does not require a response. Paragraph 94 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

95. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 95 and so deny them.

96. Paragraph 96 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 96 and so deny them.

97. Paragraph 97 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 97 and so deny them.

98. Paragraph 98 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 98 and so deny them.

99. Paragraph 99 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 99 and so deny them.

100. Paragraph 100 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 100 and so deny them.

101. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 101 and so deny them.

102. Paragraph 102 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 102 and so deny them.

103. Paragraph 103 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 103 and so deny them.

104. Paragraph 104 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 104 and so deny them.

105. Paragraph 105 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 105 and so deny them.

106. Paragraph 106 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 106 and so deny them.

COUNT 1

107. Section 1971 of the Civil Rights Act speaks for itself and does not require a response.

108. The Republican Committees deny that any of the challenged provisions of SB 1 “violates” any provision of “the Civil Rights Act.” Paragraph 108 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

109. Paragraph 109 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

110. The Republican Committees deny that any of the challenged provisions of SB 1 is “preempted by federal law.” Paragraph 110 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 will impose severe burdens on voters.

111. The Republican Committees deny that Plaintiffs are entitled to relief.

COUNT 2

112. Title II of the Americans with Disabilities Act and its implementing regulations speak for themselves and do not require a response.

113. Title II of the Americans with Disabilities Act and its implementing regulations speak for themselves and do not require a response.

114. Title II of the Americans with Disabilities Act, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 114 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

115. The Republican Committees deny that SB 1 interferes with any person’s rights under Title II. Title II of the Americans with Disabilities Act, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 115 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

116. The Republican Committees deny that SB 1 prevents voters with disabilities from fully and equally enjoying access to voting. Title II of the Americans with Disabilities Act, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 116 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

117. The Republican Committees deny that SB 1 subjects voters with disabilities to discrimination. Title II of the Americans with Disabilities Act, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 117 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

118. The Republican Committees deny that any of the challenged provisions of SB 1 “discriminate[s]” against any voter. Paragraph 118 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

119. The Republican Committees deny the allegations in Paragraph 119.

120. The Republican Committees deny the allegations in Paragraph 120.

121. The Republican Committees deny that Plaintiffs are entitled to relief.

COUNT 3

122. Section 504 of the Rehabilitation Act of 1973 speaks for itself and does not require a response.

123. Section 504 of the Rehabilitation Act of 1973 speaks for itself and does not require a response.

124. Section 504 of the Rehabilitation Act of 1973 and its implementing regulations speak for themselves and do not require a response.

125. The Republican Committees deny that SB 1 “subjects” any individual or voter “to discrimination.” Paragraph 125 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

126. The Republican Committees deny the allegations in Paragraph 126.

127. The Republican Committees deny the allegations in Paragraph 127.

128. The Republican Committees deny the allegations in Paragraph 128.

129. The Republican Committees deny that Plaintiffs are entitled to relief.

130. The Republican Committees deny the allegations in Paragraph 130.

131. The statute speaks for itself and does not require a response.

132. The statute speaks for itself and does not require a response.

133. The statute speaks for itself and does not require a response. Paragraph 133 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

134. The Republican Committees deny that the new oath provisions are unlawful. Texas law speaks for itself and does not require a response. Paragraph 134 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 134 and so deny them.

135. The statute and regulations speak for themselves and do not require a response.

136. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 136 and so deny them.

137. Paragraph 137 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 137 and so deny them.

138. Paragraph 138 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 138 and so deny them.

139. Paragraph 139 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 139 and so deny them.

140. Paragraph 140 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 140 and so deny them.

141. Paragraph 141 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 141 and so deny them.

142. Court decisions speak for themselves and do not require a response. Paragraph 142 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 142 and so deny them.

143. Paragraph 143 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 143 and so deny them.

144. Paragraph 144 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 144 and so deny them.

145. The statute speaks for itself and does not require a response. Paragraph 145 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

146. The statute speaks for itself and does not require a response. Paragraph 146 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

147. Paragraph 147 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 147 and so deny them.

148. The Republican Committees deny the allegations in Paragraph 148.

149. Paragraph 149 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 149 and so deny them.

150. Paragraph 150 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 150 and so deny them.

151. Paragraph 151 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 151 and so deny them.

152. Paragraph 152 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 152 and so deny them.

153. Paragraph 153 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 153 and so deny them.

154. Paragraph 154 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154 and so deny them.

COUNT 4

155. Section 208 of the Voting Rights Act speaks for itself and does not require a response.

156. Section 208 of the Voting Rights Act speaks for itself and does not require a response. Paragraph 156 states legal conclusions and/or statements of what the law provides or

should provide, to which no response is required. To the extent a response is required, these allegations are denied.

157. The Republican Committees deny that SB 1 “violates Section 208.” SB 1 and court decisions speak for themselves and do not require a response. Paragraph 157 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

158. SB 1 and court decisions speak for themselves and do not require a response. Paragraph 158 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

159. Court decisions speak for themselves and do not require a response. Paragraph 159 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

160. The Republican Committees deny that Plaintiffs are entitled to relief.

COUNT 5

161. The Republican Committees incorporate their responses to the allegations referenced in Paragraph 161.

162. The Republican Committees deny the allegations in Paragraph 162.

163. The Republican Committees deny that SB 1 interferes with, intimidates, or threatens voters’ rights or subjects any voter to discrimination. Title II of the Americans with Disabilities Act, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 163 states legal conclusions and/or statements of what the law provides or

should provide, to which no response is required. To the extent a response is required, these allegations are denied.

164. The Republican Committees deny the allegations in Paragraph 164.

165. The Republican Committees deny the allegations in Paragraph 165.

166. The Republican Committees deny that Plaintiffs are entitled to relief.

COUNT 6

167. The Republican Committees incorporate their responses to the allegations referenced in Paragraph 167.

168. The Republican Committees deny the allegations in Paragraph 168.

169. The Republican Committees deny the allegations in Paragraph 169.

170. The Republican Committees deny the allegations in Paragraph 170.

171. The Republican Committees deny the allegations in Paragraph 171.

172. The Republican Committees deny the allegations in Paragraph 172.

173. The Republican Committees deny that Plaintiffs are entitled to relief.

174. The statute speaks for itself and does not require a response. Paragraph 174 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

175. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 175 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

176. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 176 states legal conclusions and/or statements

of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

177. The statute speaks for itself and does not require a response. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

178. The statute speaks for itself and does not require a response. Paragraph 178 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

179. The statute speaks for itself and does not require a response. Paragraph 179 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

180. The statute speaks for itself and does not require a response. Paragraph 180 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

181. The statute speaks for itself and does not require a response. Paragraph 181 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

182. Texas law speaks for itself and does not require a response. Paragraph 182 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

183. The statute speaks for itself and does not require a response. Paragraph 183 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

184. Texas law speaks for itself and does not require a response. Paragraph 184 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

185. The statute speaks for itself and does not require a response. Paragraph 185 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

186. The statute speaks for itself and does not require a response. Paragraph 186 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

187. Paragraph 187 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 187 and so deny them.

188. Paragraph 188 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 188 and so deny them.

189. Paragraph 189 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 189 and so deny them.

190. Paragraph 190 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 190 and so deny them.

191. Paragraph 191 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 191 and so deny them.

192. Paragraph 192 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 192 and so deny them.

COUNT 7

193. The First Amendment and court decisions speak for themselves and do not require a response.

194. Paragraph 194 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required.

195. The Republican Committees deny the allegations in Paragraph 195.

196. Paragraph 196 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 196 and so deny them.

197. The Republican Committees deny that the challenged provision of SB 1 is “unconstitutionally overbroad.” Paragraph 197 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

198. Paragraph 198 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

199. Court decisions speak for themselves and do not require a response. Paragraph 199 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

200. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 200 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

201. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 201 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

202. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 202 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

203. The Republican Committees deny the allegations in Paragraph 203.

204. The Republican Committees deny that Plaintiffs are entitled to relief.

COUNT 8

205. The Constitution and court decisions speak for themselves and do not require a response.

206. Paragraph 206 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

207. The Republican Committees deny the allegations in Paragraph 207.

208. Paragraph 208 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

209. Paragraph 209 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

210. Paragraph 210 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

211. Paragraph 211 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

212. Paragraph 212 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

213. Paragraph 213 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

214. Paragraph 214 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

215. Paragraph 215 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

216. Paragraph 216 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

217. The Republican Committees deny the allegations in Paragraph 217.

218. The Republican Committees deny that Plaintiffs are entitled to relief.

PRAYER FOR RELIEF

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

AFFIRMATIVE AND OTHER DEFENSES

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

FIRST AFFIRMATIVE DEFENSE

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

SECOND AFFIRMATIVE DEFENSE

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs lack standing to assert their claims in the Complaint.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by the applicable statutes of limitations.

FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

SIXTH AFFIRMATIVE DEFENSE

Plaintiffs have failed to join indispensable parties to this action.

CONCLUSION

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

October 25, 2021

Respectfully submitted,

/s/ John M. Gore

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**Pro hac vice applications forthcoming*